

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARK W. DOBRONSKI,

Case No. 2:23-cv-12597-SJM-DRG

Plaintiff,

v.

The Honorable David R. Grand
United States Magistrate Judge

**SELECTQUOTE INSURANCE
SERVICES, et al.,**

Defendants.

Mark W. Dobronski
PO Box 222
Dexter, MI 48130-0222
Plaintiff in Propria Persona
Tel: (734) 330-9671
markdobronski@yahoo.com

TAFT STETTINIUS & HOLLISTER LLP
Jonathan Sriro (P52100)
Kelley M. Donnelly (P84678)
Attorneys for Defendants
27777 Franklin Rd., Ste. 2500
Southfield, MI 48034-8214
Tel: (248) 351-3000
Fax: (248) 351-3082
JSriro@taftlaw.com
KDonnelly@taftlaw.com

JOINT STATUS REPORT

Pursuant to the Court's February 13, 2024 Order [ECF No. 11], Plaintiff Mark W. Dobronski ("Plaintiff") and Defendants SelectQuote Insurance Services and Tuan England Pham (collectively, "Defendants"), submit the following Joint Status Report concurrently with filing a Joint Stipulation to Extend the Scheduling Order.

1. The Court's February 13, 2024 Order requested that the parties provide a status report "detailing their progress in discovery, their willingness to participate

in alternative dispute resolution, and an anticipated timeline of when they will be prepared to engage in meaningful mediation.” [ECF No. 11, PageID. 241].

2. Both Plaintiff and Defendants have engaged in discovery and have each provided initial and supplemental responses to discovery. Plaintiff and Defendants have also both engaged in third party discovery, having issued subpoenas to non-parties. The parties are now attempting to schedule depositions and expect to be able to conduct all depositions by the end of March. Concurrently with this Joint Status Report, the parties have submitted a Stipulated Order to Extend Scheduling Order Dates. This Stipulated Order requests that the Court adjourn the November 8, 2023 Scheduling Order dates as follows:

	November 8, 2023 Scheduling Order	Proposed Amended Scheduling Order Dates
Discovery Ends	March 1, 2024	April 15, 2024
Dispositive Motions Due	March 29, 2024	May 15, 2024
Final Pretrial Conference	August 21, 2024, 2:00 PM	August 21, 2024, 2:00 PM
Trial	September 3, 2024	September 3, 2024

This is the first requested adjournment in this case. The case was initiated and removed to federal court in October of 2023. The Court’s initial Scheduling Order was issued on November 8, 2023, setting the discovery deadline as March 1, 2024. In that time were the Thanksgiving, Christmas, and New Year holidays making the scheduling of depositions difficult. The parties are working diligently to wrap up

discovery and are only seeking a brief 45 day adjournment of the discovery and dispositive motion cut off and are not seeking an adjournment of the trial date.

3. The Defendants and the Plaintiff are both willing to engage in alternative dispute resolution provided that Defendants may appear by video as Defendant SelectQuote representatives reside in Kansas and Defendant Pham resides in California. The parties expect to meaningfully be able to engage in mediation following the proposed close of discovery on April 15, 2024. The parties would try to schedule and hold mediation by May 15, 2024 and would be motivated to do so due to the proposed dispositive motion cutoff date.

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ Mark W. Dobronski
Mark W. Dobronski
PO Box 222
Dexter, MI 48130-0222
Plaintiff in Propria Persona
Tel: (734) 330-9671
markdobronski@yahoo.com

By: /s/ Kelley M. Donnelly
Jonathan Sriro (P52100)
Kelley M. Donnelly (P84678)
Attorneys for Defendants
27777 Franklin Rd., Ste. 2500
Tel: (248) 351-3000
Fax: (248) 351-3082
JSriro@taftlaw.com
KDonnelly@taftlaw.com

Dated: February 28, 2024